

## MORVILLO ABRAMOWITZ GRAND IASON &amp; ANELLO P.C.

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## MEMORANDUM ENDORSED

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November 26, 2024

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The Honorable Gregory H. Woods  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 12C  
New York, New York 10007

Re: *United States v. Alvin Eusebio,*  
22 Cr. 522 (GHW)

Dear Judge Woods:

We represent Alvin Eusebio in the above-captioned matter. On November 15, 2024, a jury convicted Mr. Eusebio on both counts of the sixth superseding indictment. Pursuant to Fed. R. Crim. P. 29(c)(1), Mr. Eusebio's time to file a motion for judgment of acquittal expires on November 29, 2024. In light of the press of business and the impending holiday, we respectfully request that the time for Mr. Eusebio to file this motion be extended until Monday, December 3, 2024.<sup>1</sup> No previous request has been made for this relief. The government consents to this request.

Application granted. Defendant's November 26, 2024 request for an extension of time to file a motion for judgment of acquittal, Dkt. No. 607, is granted. The deadline for the Defendant to file his motion for judgment of acquittal is extended to December 3, 2024. In addition, a number of motions that were resolved before trial appear to be pending. Therefore, the Clerk of Court is directed to terminate the motions pending at Dkt. Nos. 508, 512, 586, 588, 590, and 607.

SO ORDERED.

Dated: November 26, 2024

  
GREGORY H. WOODS  
United States District Judge

Respectfully submitted,  
/s/ Telemachus P. Kasulis  
Telemachus P. Kasulis

cc: Ashley Nicolas, Esq.; Andrew Jones, Esq.; Benjamin Burkett, Esq.

<sup>1</sup> We understand that the United States District Court for the Southern District of New York is observing a court holiday on Friday, and that the Seventh and Ninth Circuits have held that such circumstances render the court "inaccessible" within the meaning of the federal rules governing computation of time. See *Latham v. Dominick's Finer Foods*, 149 F.3d 673, 674 (7th Cir. 1998); *Keyser v. Sacramento City Unified School Dist.*, 265 F.3d 741, 747 (9th Cir. 2001). Nevertheless, we make this letter motion in an abundance of caution.